

### **AMENDMENTS TO THE DRAWINGS**

Applicant respectfully submits an Appendix that is attached to this Amendment and Response containing fifteen replacement sheets of formal drawings in compliance with 37 C.F.R. § 1.121(d). Applicants respectfully submit that no amendments have been made and that no new matter is included by these replacement sheets. Applicants respectfully request entry and examination of the replacement drawings.

### **REMARKS**

Claims 1-18 are currently pending. Claims 1-8 and 10-12 have been rejected. Applicants have amended claims 1-2, 13 and 15. Support for the amendments to claims can be found throughout the specification and at least in Paragraphs 17, 44 and 46 in the application as originally filed. Applicants submit that the claims have been amended in compliance with 37 C.F.R. § 1.121(c) and that no new matter has been introduced by the present Amendment.

Applicants have also amended the specification to correct typographical errors. Applicants respectfully submit that no new matter is included by these amendments to the specification.

#### ***Rejection of Claims Under 35 U.S.C. § 112***

1. The Office Action states that claims 2-5 and 11-12 are rejected under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regards as the invention. The Office Action also states that as claims 3-5 and 11-12 are rejected as they are dependent on claim 2.

The Office Action states that it is not clear why the data packet received from asynchronous switch is disassembled into subpackets since claim 1 discloses the step of constructing subpackets. Applicants respectfully disagree as claim 1 recites that the data packet includes a plurality of subpackets, each associated with a destination time slot identifier, therefore, Applicants respectfully submit that it is clear that the data packet received from the asynchronous switch should be disassembled into subpackets.

In the interest of expediting prosecution, claim 2 has been amended to reflect that the data packet includes a plurality of subpackets and that each subpacket is associated with a destination time slot identifier. Applicants respectfully submit that the amendment places claim 2 in condition for allowance. As claims 3-5 and 11-12 are dependent on claim 2, Applicants respectfully submit that claims 3-5 and 11-12 also are in condition for allowance.

***Allowable Subject Matter***

2. Applicants thank the Examiner for allowing claims 13-14 and 16-18. Applicants also thank the Examiner for noting that claims 2-5 and 11-12 would be allowable if re-written to overcome the rejection(s) under 35 U.S.C. § 112. Applicants have amended claim 2 to traverse the rejection under 35 U.S.C. § 112 and respectfully submit that claims 2-5 and 11-12 are in condition for allowance.

***Rejection of Claims Under 35 U.S.C. § 102(e)***

3. The Office Action states that claims 1, 6-8, 10 and 15 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,836,479 issued to Sakamoto et al. ("Sakamoto"). For a claim to be anticipated under 35 U.S.C. § 102(e), the reference must disclose each and every limitation in the claim. Applicants respectfully disagree with the rejection and traverse the rejection.

With regards to claim 1, Applicant respectfully submits that Sakamoto fails to disclose, teach or suggest, at least, converting a stream of synchronous serial data associated with a source time slot in a time-division multiplexing frame into a plurality of parallel data units. With regards to claim 15, Applicants respectfully submits that Sakamoto fails to disclose, teach or suggest, at least, a plurality of synchronous serial data streams each from a different source time slot in a time-division multiplexing frame. Briefly, Sakamoto discloses a variable length packet communication device having an input interface that segments an input packet into a plurality of fixed length cells. (See Sakamoto at Col. 5, lines 15-19; Figure 1, block 3-1). Sakamoto also discloses an input interface that generates a container to transmit packet/packets to the same output interface. (See Sakamoto at Col. 8, lines 44-47). Therefore, Sakamoto discloses an input interface that handles asynchronous packets of data. Therefore, Sakamoto fails to disclose, teach or suggest, at least, synchronous serial data in a time-division multiplexing frame.

With regards to claim 1 and 15, Applicants respectfully submit that Sakamoto fails to disclose, teach or suggest, at least, a source time slot in a time-division multiplexing frame. Applicants also respectfully submit that the use of the term "time slot" in the claims differs from

the time slots referred to in Sakamoto. Sakamoto uses the term time slot to describe the time that a container having packet/packets is sent through the container switch. (See Sakamoto at Col. 8, lines 48-49; Figure 6). In contrast, "time slot" as used in Applicants' claimed invention refers to a time slot in a time-division multiplexing (TDM) frame.

With regards to claim 1, Applicants respectfully submit that Sakamoto fails to disclose, teach or suggest, at least, a synchronization interval. The Office Action cites Figure 3 and queue 15 in Sakamoto as disclosing constructing, during a synchronization interval, at least one subpacket in memory from the plurality of parallel data units. Sakamoto discloses that each of the input interfaces have "n" queues corresponding to output interfaces respectively, wherein "n" is the number of output interfaces. (See Sakamoto at Col. 8, lines 55-58). However, as stated above, Sakamoto's input interface handles asynchronous packets of data. Therefore, Applicants respectfully submit that Sakamoto fails to disclose, teach or suggest, at least, a synchronization interval.

With regards to claim 1, Applicants also respectfully submit that Sakamoto fails to disclose, teach or suggest, at least, storing memory context information, including a destination time slot identifier, for each subpacket associated with the source time slot in a time-division multiplexing frame. Sakamoto discloses that each of the input interfaces have "n" queues corresponding to output interfaces respectively, wherein "n" is the number of output interfaces. (See Sakamoto at Col. 8, lines 55-58; Figure 3). Therefore, Sakamoto's "n" queues correspond to the number of switch interface modules. In contrast, Applicants' claimed invention recites memory context information associating a source time slot in a time-division multiplexing frame with a destination time slot. (See '352 Application at Paragraph 54).

With regards to claim 1, Applicants respectfully submit that Sakamoto fails to disclose, teach or suggest, at least, constructing a data packet in memory, the data packet including at least one synchronization tag identifying the synchronization interval, a plurality of subpackets, and the respective memory context information associated with each of the subpackets. As stated above, Sakamoto fails to disclose memory context information associating a source time slot in a time-division multiplexing frame with a destination time slot. The Office Action also states that

Figure 16 of Sakamoto discloses a synchronization tag identifying the synchronization interval. Sakamoto fails to disclose, teach or suggest, at least a synchronization interval, as Sakamoto discloses packet based data. Furthermore, Figure 16 in Sakamoto discloses the standard IP packet structure where flags are used to indicate whether the IP payload is fragmented. In contrast, Applicants' claimed invention utilizes a synchronization tag identifying the synchronization interval to synchronize the play-out time for each subpacket. (See '352 Application at Paragraph 60).

Claims 6-8, 10 depend from claim 1. For the same reasons as stated above for claim 1, Applicants respectfully submit that claims 6-8 and 10 are in condition for allowance.

**CONCLUSION**

Applicants' discussion of particular positions of the Examiner does not constitute a concession with respect to any positions that are not expressly contested by the Applicants. Applicants' emphasis of particular reasons why the claims are patentable does not imply that there are not other sufficient reasons why the claims are patentable nor does it imply the claims were not allowable in their unamended form.

In view of the foregoing remarks and the inability of the prior art, alone or in combination to anticipate, suggest, or make obvious the subject matter as a whole of the invention disclosed and claimed in this application, all claims are submitted to be in a condition for allowance, and notice thereof is respectfully requested. If the Examiner feels that a telephone conference would expedite the prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Miranda", written over a horizontal line.

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